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Stag Brewery Hybrid Application 22/0900/OUT

I am writing as a long term (35 years) resident of Lower Richmond Road , Mortlake, who has followed the saga of the proposed redevelopment of this site since the announcement by the owners, AB INBEV, in 2009, that the brewery would close the following year.

These objections relate to the whole scheme as the proposals for the school are interrelated, but I have made separate objections to the school elsewhere.

DENSITY AND SCALE

The Supplementary Planning Document (SPD) published by the Council in 2011 following extensive involvement with the local community provides for a much smaller development, primarily residential - led (some 500) units, but with a mix of commercial and community uses to create a new " heart " for Mortlake which had been lost with the widening of Mortlake High Street in the 1960s and a new primary school.

This proposed scheme is much too large and overpowering and would effectively double the population of Mortlake.

HEIGHT AND RIVERSIDE

When the Planning Applications were called in by the Mayor, principally because of the small proportion of affordable housing, the Developers, in consultation with the Mayor's Planning Team, sought to accomplish this by increasing the total amount of housing and increasing the height of most of the blocks.

These new plans have reduced the heights in some places but several blocks still exceed the 7 - storey upper limit for buildings on this site.

In his summing - up at the Hearing in July 2021, the Mayor said he "recognised that important riverside views were at risk and that the development would adversely affect the Arcadian and open character of the area generally ".

In giving his reasons for refusing the Application he concluded that the benefits were outweighed by the harms.

TRAFFIC

The development site is physically constrained by the River to the North and the Lower Richmond Road to the South, with pinch points at Chalker's Corner at one end and the Sheen Lane level crossing at the other.

Any development on the Brewery site will result in additional traffic. The Mayor acknowledged in his Summing - up that he was aware, following his visit to the site the day before the Hearing (unfortunately, mid - morning on the first day of the school Summer holidays) that traffic in the area is very heavy. He put this down to the use of the private car which he said must be discouraged and he noted that the number of underground car parking spaces in the development had been reduced.

However, traffic is much more than private cars being used for short journeys which could be undertaken on foot or cycle. Lower Richmond Road is primarily a residential road, but it is also an " A " road (A 2003) which feeds into the junction of the South Circular Road (A205) which, in turn, feeds into the M4 and M1, and the Chertsey Road (A316

) which feeds into the M3 and M1. As such it is a feeder into and out of London and any measures taken to speed up traffic flow through Chalker's Corner would probably only attract more traffic into the area.

The vehicle mix consists of some private cars, but also many commercial vehicles e.g. lorries, tradesmen 's vans, coaches, buses, cycles, electric scooters and prams.

With the new development there will be a vast increase in the number of cyclists (3,378 cycle docking places are proposed), pedestrians using narrow pavements, and particularly needing to cross the busy road to get into and out of the development including to the river and to the cinema (if that is really needed).

Following COVID, shopping patterns have changed and more and more is being done online requiring home delivery. Parking provision on-site for deliveries to residents and for the school seem to have been underestimated.

All this extra traffic will also affect the railway crossing, the gates of which are closed for up to 45 minutes in every hour . The mitigation measures which the Developers have come up with to reduce congestion at the crossing are purely cosmetic and why Network Rail who regard this crossing as the second most dangerous in the whole South Western Region and who have previously said that only the most radical measures could solve the problem, did not object is inexplicable.

The Developers recognised the problems with Chalker's Corner and in the earlier planning application (Application C)they proposed a widening of the junction by taking land at the apex of Chertsey Court. This was not approved by Richmond Council and as the three Applications (A, B and C)were linked the whole thing failed . It was then called in by the Mayor who rejected the whole scheme, including the school.

In place of the Chertsey Court proposals the Developers looked other mitigation options including a slip lane on the left - hand side of Lower Richmond Road approaching Chalker's Corner. Interestingly, in their submission to the Mayor they claimed that this, in itself, would be insufficient but they are now putting it forward as the only solution along with the possibility of some vague unspecified future discussions with Transport For London.

They have also made further transport proposals such as introducing a 20 mph speed limit on the Lower Richmond Road between Williams Lane and Bull's Alley. (N.B. There is already a 20 mph limit on the Lower Richmond Road from Chalker's Corner along Mortlake High Street and indeed all non - trunk roads in the Borough.

The Developer's transport consultants have also concluded that there has been a negligible increase in traffic following the closure of Hammersmith Bridge . As a local resident I know that this is absolute nonsense as, before closure, most of the traffic approaching Chalker's Corner wanted to get in to get into the inside lane approaching the first set of traffic lights, since closure most of the traffic now wants to get into the outside lane to turn right in order to cross Chiswick Bridge.

Also, in the Developer's webinar in January 2022, the Stantec representative stated that there would be less traffic after the development was complete than before. REALLY ?

With no agreement on funding in place there is no likelihood of Hammersmith Bridge re - opening for many years and the traffic around Mortlake, Barnes and Sheen will become even more unbearable.

AIR QUALITY

The Developers have been at great pains to demonstrate that the effects of the development on the Lower Richmond Road (apart from Chalker's Corner) will be less than 40mcg / m³, which was the current UK / EU / WHO maximum limit for NO. However, on 22nd September 2021, the WHO updated it's guidelines, which had previously been set in 2005, to 10mcg / m³, based on evaluation of current scientific evidence of the damage to health

The WHO also lowered it's maximum limit for PM_{2.5}, which is the most dangerous form of air pollution, as these particles are small enough to penetrate the lung barrier and enter the blood stream. The UK limit is currently 25mcg

/ m3 and the previous WHO limit was 10mcg /m3 . This has now been revised to 5mcg / m3 but the WHO stresses that there is no safe limit.

There has been strong pressure, notably from Client Earth, and The Times newspaper's Clean Air for All campaign for the UK government to incorporate the WHO limits into the much delayed new Environment Act and to make them enforceable by law

Richmond has not been able to measure or monitor PM2.5 levels up until very recently. But Breathe London has recently installed a measuring device at Chalker's Corner. It is fixed to the lamp post at the first set of traffic lights on the south side of Lower Richmond Road. I can say with complete confidence that the measurements will exceed the new WHO limit.

AFFORDABLE HOUSING

The Mayor was very critical of Richmond 's record on affordable housing and especially the proportion contained in the original Application approved in January 2020. Despite increasing the total number of residential units from 893 to 1,250 by increasing the height of most of the blocks, the Mayor was still not satisfied with the proportion of affordable housing achieved and criticised the increased height and massing this entailed.

The latest proposals have reduced the sizes of some of the blocks, but the others still exceed the upper limit for buildings on this site and it seems that the proportion of affordable housing is still likely to be lower than the Mayor expects.

Stag Brewery School Application 22/0902/FUL

REASONS FOR OBJECTING

The closing date for receipt of offers for the former Stag Brewery site was 30th September, 2015, although the aquisition was not completed and announced until 27th November 2015.

The Council resolved to substitute a Secondary school for the Primary school which had been included in the Planning Brief, on 15th October, 2015. Whether this had any material effect on the price paid or the plans on which this was based, I do not know. However, I do know that the commercial property press were speculating prior to the sale that a price of up to £100 M might be achieved . In the event the sale price was £ 158m.

Nevertheles, then substitution of a 1200 place Secondary school for a two form entry Primary school has a large impact on other aspects of the Development.

The siting of a school of this size requires the loss of protected historic grass sports fields and replacement with artificial all- weather surfaces . The re-provision of this lost green space is only partially met in other small parcels between buildings in the rest of the development.

The size of the proposed school is woefully undersized for the number of pupils, with too little outdoor space and the amount of required for teachers, ancillary staff and deliveries seems to be greatly underestimated.

The sheer numbers of pupils, staff and visitors entering and leaving the site on foot, by bicycle (and by electric scooter), particularly at peak times will have a big impact on the surrounding roads and especially the congestion at the railway crossing

People who know far more than me about these things (pupil number forecasting) have produced very convincing arguments to demonstrate that there is no need for a new Secondary school. The head teachers of the two existing schools , Richmond Park Academy and Christ's School maintain that they could accommodate the forecast pupil numbers and the creation of a new school would compromise the viability of their 6th forms.

In September 2013, before the Brewery site become available, Thomson House Primary school was opened on two unsatisfactory sites either side of the railway crossing. There are no recreational facilities on either site and the pupils have to use Mortlake Green and, under a temporary arrangement the Stag Brewery playing field for exercise.

The obvious thing would be to cancel the Secondary school and relocate Thomson House School on to the Brewery site. It is understood that the Developers, the School Governors, the Head Teacher (and I am sure the teachers and pupils, parents and other users of Mortlake Green) would welcome this.

Nevertheless, the Council remains adamant that a new Secondary school is "desperately needed".

Surely this can be satisfactorily resolved. It is not matter for party politics; it is far more important than that !

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